

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Pamela Y. Edwards Debtor(s) PENNSYLVANIA HOUSING FINANCE AGENCY Movant vs. Pamela Y. Edwards Debtor(s) Legene Edwards Co-Debtor William C. Miller Esq. Trustee		CHAPTER 13 NO. 20-10326 ELF 11 U.S.C. Section 362 and 1301
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**MOTION OF PENNSYLVANIA HOUSING FINANCE AGENCY
FOR RELIEF FROM THE AUTOMATIC STAY
UNDER SECTION 362 AND 1301**

1. Movant is PENNSYLVANIA HOUSING FINANCE AGENCY.
2. Debtor(s) and Co-Debtor, Legene Edwards are the owner(s) of the premises 5222 North 15th Street, Philadelphia, PA 19141, hereinafter referred to as the mortgaged premises.
3. Movant is the holder of a mortgage, original principal amount of \$133,421.00 on the mortgaged premises that was execute by Debtor Pamela Y. Edwards and Co-Debtor, Legene Edwards as co-mortgagors on October 19, 2011. Said mortgage was recorded on October 26, 2011 in Document ID 52405347. The Mortgage was subsequently assigned to Movant by way of Assignment of Mortgage recorded on October 26, 2011, in Document ID 52405354 in Philadelphia County.
4. William C. Miller Esq., is the Trustee appointed by the Court.
5. The commencement and/or continuation of the mortgage foreclosure proceedings by reason of non-payment of monthly mortgage payments were stayed by the filing of a Chapter 13 Petition in Bankruptcy by the Debtor(s).
6. Debtor(s) and Co-Debtor have failed to make the monthly post-petition mortgage payments in the amount of \$1,105.30 with monthly late charges at \$29.47 each for the months of March 2020 through November 2020.

7. In addition to the other amounts due to Movant reflected in this Motion, as of the date hereof, in connection with seeking the relief requested in this Motion, Movant has also incurred legal fees and legal costs. Movant reserves all rights to seek an award or allowance of such fees and expenses in accordance with applicable loan documents and related agreements, the Bankruptcy Code and otherwise applicable law.

8. The total amount necessary to reinstate the loan post-petition is **\$10,212.93** (plus attorney's fees & costs).

9. Movant is entitled to relief from stay for cause.

10. This motion and the averments contained therein do not constitute a waiver by Movant of its right to seek reimbursement of any amounts not included in this motion, including fees and costs, due under the terms of the mortgage and applicable law.

WHEREFORE, Movant prays that an Order be entered modifying the Stay and permitting Movant to proceed with its mortgage foreclosure on the mortgaged premises, and to allow the Sheriff's Grantee to take any legal action to enforce its right to possession of the mortgage premises. Further, Movant prays that an Order be entered awarding Movant the costs of this suit, reasonable attorney's fees in accordance with the mortgage document and current law together with interest.

/s/ Rebecca A. Solarz, Esquire

Rebecca A. Solarz, Esquire

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